



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
LANSING



C. HEIDI GRETHUR  
DIRECTOR

November 27, 2017

Mr. John P. Reese  
New Covert Generating Company  
300 Atlantic Street, 5<sup>th</sup> Floor  
Stamford, Connecticut 06901

SRN: N6767; Van Buren County

Dear Mr. Reese:

**VIOLATION NOTICE**

The Michigan Department of Environmental Quality (MDEQ), Air Quality Division (AQD), reviewed the quarterly excess emission reports submitted by New Covert Generating Company, located at 26000 77<sup>th</sup> Street, in Covert, Michigan. The Renewable Operating Permit number MI-ROP-N6767-2014C, requires the facility to monitor and record nitrogen oxides and carbon monoxide emissions from the Unit 1 natural gas-fired turbine and duct burner on a continuous basis, in a manner, and with instrumentation acceptable to the AQD. This unit is also subject to Title 40 of the Code of Federal Regulations (CFR) Part 60, Subpart Da.

The second and third quarter 2017 excess emission reports indicated that there was an extended period of monitor downtime. Specifically, from June 23, 2017, through July 25, 2017, all Unit 1 monitors were calibrated daily in a direct to the monitor mode, rather than through the system. This resulted in the following monitor downtime: second quarter nitrogen oxides monitor 10.8%, third quarter nitrogen oxides monitor 28.7%, two quarter combined nitrogen oxides monitor 20.5%; second quarter carbon monoxide 10.1%, third quarter carbon monoxide 28.6%, two quarter combined carbon monoxide 20.2%.

Subpart Da requires in 60.49 Da (f), that emission data be provided for a minimum of 18 hours each operating day in at least 22 out of 30 successive operating days. The nitrogen oxides monitor failed to meet this requirement for 32 successive operating days.

During the review, staff noted the following:

Process Description	Rule/Permit Condition Violated	Comments
EU-TURBINE1, EU-DB1	40 CFR, 60.49 Da (f)	Failure to meet minimum data requirements
EU-TURBINE1, EU-DB1	MI-ROP-N6767-2014c, FG-TURB/DB1-3, VI, 2	Failure to continuously monitor nitrogen oxides emissions
EU-TURBINE1, EU-DB1	MI-ROP-N6767-2014c, FG-TURB/DB1-3, VI, 3	Failure to continuously monitor carbon monoxide emissions

Mr. John P. Reese  
Page 2  
November 27, 2017

Please initiate the actions necessary to correct the cited violations and submit a written response to this Violation Notice by December 18, 2017 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If New Covert Generating believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violations cited above. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely



Tom Gasloli  
Technical Programs Unit  
Field Operations Section  
Air Quality Division  
517-248-6778

cc: Ms. Lynn Fiedler, MDEQ  
Mr. Christopher Ethridge, MDEQ  
Ms. Mary Douglas, MDEQ  
Ms. Amanda Chapel, MDEQ  
Mr. Thomas Hess, MDEQ  
Ms. Karen Kajiya-Mills, MDEQ